

DISCOVERY PLAN WORKSHEET	
Phase I (Pre-Settlement Discovery)	
Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	9/15/17
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	11/14/17
Date for initial settlement conference: <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	11/29/17
Phase II (Discovery and Motion Practice)	
Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference)</i>	12/14/17
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	12/29/17
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	4/12/18
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	5/14/18
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	6/15/18
COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference) - 9/15/17</i>	MAY 30, 2018 6/15/18
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	

* Federal defendants will submit a letter concluding Phase II